

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DANIEL ZAMORA and CGC, INC.,

Plaintiffs,

-against-

JPMORGAN CHASE BANK, N.A., JPMORGAN  
CHASE BANK & CO., FIT INTERNATIONAL  
GROUP CORP., FOREX INTERNATIONAL  
TEAM INC., JAIRO ENRIQUE SANCHEZ, and  
DILIA MARGARITA BAEZ,

Defendants.

No. 14 Civ. 5344 (WHP)

**ORAL ARGUMENT REQUESTED**

**NOTICE OF DEFENDANTS' MOTION TO DISMISS AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiffs' Amended Complaint, dated March 4, 2015, Defendants JPMorgan Chase & Co. and JP Morgan Chase Bank, N.A., by and through their undersigned counsel, will move before this Court, before the Honorable William H. Pauley III, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, NY 10007, at a time and date convenient for the Court, for an order dismissing with prejudice all claims in the Amended Complaint against the Defendants for failure to state a claim under Rule 12(b)(6) of the Federal Rules of Civil Procedure. The basis for the motion is set forth in the accompanying Memorandum of Law.

Pursuant to this Court's order dated December 9, 2014 (Dkt. No. 24), Plaintiffs' opposition (if any) is due on March 25, 2015 and Defendants' reply (if any) is due on April 3, 2015.

Dated: New York, New York  
March 4, 2015

Respectfully submitted,

/s/ Noah Levine

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*Attorneys for Defendants JP Morgan Chase &  
Co. and JP Morgan Chase Bank, N.A.*

**Certificate of Service**

I hereby certify that on the 4<sup>th</sup> day of March 2015, a copy of the (i) foregoing Notice of Motion and (ii) Memorandum of Law in Support of the Motion to Dismiss by Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. was filed with the Court through the CM/ECF system and served on all Filing Users. The following parties who are not Filing Users were served by mail.

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Dated: March 4, 2015

/s/ Noah Levine  
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